



COASTAL ENVIRONMENTAL ANALYSTS

30 January 2008

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**RE: Comments on the COS Samoa Packing Company, Inc Draft NPDES Permit
(AS0000027)**

At the request and on behalf of COS Samoa Packing we have reviewed, and are submitting, the following comments on the draft permit issued by the U.S. Environmental Protection Agency – Region 9 (EPA):

Comment 1: Cover

The latitude and longitude of the discharge appear to be based on old information and datum (NAD 27-Preliminary). In addition the Latitude is entered incorrectly in the permit as 13° and should be 14°. We request the correct specification (based on the more recent WGS 84 datum) be used:

Outfall Latitude: S 14° 16.824' and Outfall Longitude: W 170° 40.133'.

This would update the location to the datum specification currently in use. This location was measured at the blind flange (end gate) end of the diffuser by Associated Underwater Services in 2007 during outfall maintenance work.

Comment 2: Part I.A Table 1

We request that the limitation for pH be amended to include the following (which could be added to Part I.B.

The pH is limited between 6.5 and 8.6 standard units. The total time during which the pH values are outside the required range of pH shall not exceed 7 hours and 26 minutes in any calendar month; and no individual excursions from the range of pH values shall exceed 60 minutes.

This is consistent with the existing permit and provides required flexibility in the pH control process. It is noted that the high dilutions achieved by the diffuser will limit any excursions in the receiving water to an extremely small region.

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Comment 3: Part I.A Table 1

We note that the units for the limitations stated as loading are not in the table but appear to be, and should be, lbs/day. We also note that the table of limitations includes limitations for the existing permit which should be removed in the new final permit.

Comment 4: Part I.B.5

We request that this limitation be stated as: The discharge shall not cause the temperature in the receiving water to deviate more than 1.5 degrees Fahrenheit from conditions which would occur naturally, fluctuate more than 1 degree Fahrenheit on an hourly basis, or exceed 85 degrees Fahrenheit due to the influence of other than natural causes *outside of the zone of initial dilution*;

This would provide consistency with the existing permit and with the limitations for temperature as stated in Table 1.

Comment 5: Part I.B.6

We request that this limitation be stated as: The discharge shall not cause the concentration of toxic pollutants in the receiving water to exceed aquatic life criteria for marine waters or human health criteria for consumption of organisms found in EPA 2002a, or the more recent version (*or as found in the ASWQS for arsenic and mercury*) *outside of the zones of mixing established for copper, zinc, ammonia, and mercury*;

This would provide consistency with the limitations for specific constituents as stated in Table 1.

Comment 6: Part I.B.7

We request that this limitation be stated as: The discharge shall not cause the turbidity in the receiving water to exceed 0.75 Nephelometric Units *outside of the zone of initial dilution*;

This would provide consistency with the existing permit and with the limitations for TSS as stated in Table 1.

Comment 7: Part I.B.8

We request that this limitation be stated as: The discharge shall not cause the light penetration depth to be less than 65.0 feet (not to exceed given value 50 percent of the time) *outside of the zone of initial dilution*;

This would provide consistency with the existing permit and with the limitations for TSS as stated in Table 1.

Comment 8: Part I.B.9

We request that this limitation be stated as: The discharge shall not cause the concentration of dissolved oxygen to be less than 70 percent of saturation or less than 5.0 mg/l *outside of the zone of initial dilution*. If the natural level of dissolved oxygen is less than 5.0 mg/l, the natural level shall become the standard.

This would provide consistency with the existing permit and with the limitations for **BOD** as stated in Table 1.

Comment 9: Part II.A.1.a

We note that it is required that samples and measurements shall be “representative”. We interpret that as meaning samples for effluent monitoring should be taken during normal operations on production days. If this is not the case we request clarification.

Comment 10: Part II.A.3.d

It is not clear how the “records of monitoring information” are to be reported. Please clarify if these are to be submitted with the DMR forms.

Comment 11: Part II.B.1

We request that the priority pollutant scan be conducted during the latter half of *fourth year* *or* the fifth year of the permit.

This will provide flexibility to coordinate the required sampling with other monitoring requirements and insure that the data are available for the permit renewal deadline.

Comment 12: Part V.A.2.a

The special condition requires a workplan be submitted to EPA and AS EPA “no later than one year after the effective date of the permit”. However Table 2 requires the workplan no later than 180 days following the effective date of the permit. Because the first of the specifications noted was emphasized in bold font in the draft permit, we believe the one year date is EPA’s intention. We request that Table 2 be corrected to require the workplan within one year of the effective data of the permit.

Comment 13: Part V.B.1.a.iv

We note that this item is redundant since it is also required in Item vii.

Comment 14: Part V.B.1.a.vii

We request that this item be changed as indicated below.

All stations at the zone of initial dilution, zone of mixing, and reference site the measurement of vertical profiles of temperature, salinity, ~~light penetration~~, and dissolved oxygen, *and light penetration at 65 feet*, to determine compliance with narrative WQBELs and/or ASWQS, and for future initial dilution and mixing zone re-analyses if determined necessary by EPA and ASEPA.

This would be consistent with the ASWQS for light penetration. It is noted that the light meters being used, and other commercially available instruments appropriate for use in Pago Pago Harbor, have a depth limits that would preclude full vertical profiles at the depths found in the Harbor.

Comment 15: Part V.D.2.d

Please clarify the time within which re-sampling and re-testing must occur. Should this be interpreted as re-sampling within 14 days of receiving the test results from the laboratory?

Comment 16: Miscellaneous typographical errors

Page 20 of 21 - paragraph 1: 10n should be 10ⁿ and 101 should be 10¹

Comment 17: General Comments

We would like to note that meeting specific holding times for samples shipped to mainland laboratories is often difficult and occasionally impossible using commercially available shipping methods. This occurs because the only commercial flights going east (from American Samoa to Honolulu and then to the U.S.) currently leave on Sunday and Thursday. Since normal production days for prehensive samples are typically from noon Monday through noon Friday, samples must be shipped on Thursday. The only express shipper is DHL. Shipments will arrive in Honolulu on Friday morning and will not generally clear customs until Friday afternoon. They will therefore not leave Honolulu until Monday under normal circumstances. Therefore, Tuesday delivery is the soonest delivery will be made, and experience indicates it is often later. This also means that sample temperatures may be above the prescribed holding temperatures. StarKist Samoa will make reasonable efforts to meet holding times and temperature requirements, but we anticipate that there will be instances that this will not be possible. In such cases laboratories will be instructed to run the required analyses and holding time and temperature exceedances will be noted in the laboratory reports.

Thank you for your consideration of the comments provided above. If you have any questions please contact COS Samoa Packing directly or contact us at your convenience,

Sincerely

Karen A. Glatzel